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 800 DC, LLC D/B/A BIZZIE and 1-800-DRY CLEAN

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

LAWRENCE SHIFMAN, an individual,  
 GORETTI SHIFMAN, an individual, DRY  
 CLEANING DELIVERY SERVICES, INC., a  
 California corporation,,  
 Plaintiff,

vs.

800 DC, LLC D/B/A BIZZIE and 1-800-DRY  
 CLEAN, a Michigan corporation,  
 KOSTOPOULOS RODRIGUEZ, PLLC, a  
 Michigan Professional limited liability  
 company, K. DINO KOSTOPOULOS, an  
 individual, DOE ONE through DOE TWENTY,  
 inclusive,

Defendants.

Case No. 3:13-cv-05934-EMC

**STIPULATION AND ORDER TO  
 CONTINUE INITIAL CASE  
 MANAGEMENT CONFERENCE**

Current Date of CMC: March 27, 2014

Stipulated Date of  
 Continued CMC: May 29, 2014  
 Time: 9:00 a.m.  
 Courtroom: 5

Pursuant to the United States District Court for the Northern District of California  
 Local Rules ("Civil L.R."), Rule 16, Defendants 800 DC, LLC d/b/a/ BIZZIE and 1-800-  
 DRY CLEAN ("800 DC"); Kostopoulos Rodriguez, PLLC; and, K. Dino Kostopoulos,  
 individually, (collectively "Defendants"), and Plaintiffs Lawrence Shifman, individually;  
 Goretti Shifman, individually; and, Dry Cleaning Delivery Services, Inc. ("DCDS")  
 (collectively "Plaintiffs"), by and through their respective counsel, have met and conferred  
 and hereby stipulate and seek relief from the Court concerning obligation imposed by the

1 Order Setting Initial Case Management Conference dated December 27, 2013, requesting the  
 2 Court to continue the Initial Case Management Conference ("CMC"), and all associated  
 3 deadlines, presently scheduled for March 27, 2014 at 9:00 a.m. in Courtroom 5, on the 17th  
 4 floor of the San Francisco Courthouse located at 450 Golden Gate Avenue, San Francisco,  
 5 California, until **May 29, 2014 at 9:00 a.m. in Courtroom 5** at the same location due to  
 6 Defendants' pending dispositive Motion to Dismiss and Special Motion to Strike filed  
 7 pursuant to Civil L.R. 7, which are scheduled to be heard by the Honorable Edward M. Chen  
 8 on March 13, 2014 at 1:30 p.m. in Courtroom 5.

9 The Parties submit that continuing the CMC to May 29, 2014 will allow adequate  
 10 time for the Court to render its decision on Defendants' dispositive motions before the  
 11 Parties' compliance with the associated ADR and other such deadlines is required. It is  
 12 further noted that Randall M. Widmann, counsel for Plaintiffs, previously filed with the  
 13 Court a Notice of Unavailability from May 1, 2014 through May 16, 2014.

14 **IT IS HEREBY STIPULATED**

15  
 16 Dated: March 6, 2014

HINSHAW & CULBERTSON LLP

17 By: 

18 RONALD E. MALLEN  
 19 KENDRA L. BASNER  
 Attorneys for Defendants  
 20 KOSTOPOULOS RODRIGUEZ, PLLC,  
 K. DINO KOSTOPOULOS  
 800 DC, LLC D/B/A BIZZIE and 1-800-DRY  
 21 CLEAN

22 Dated: March 6, 2014

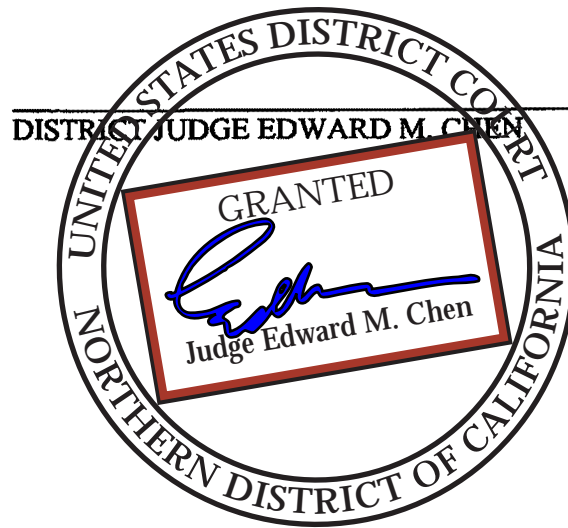
LAW OFFICES OF RANDALL M. WIDMANN

23 By: 

24 RANDALL M. WIDMANN  
 25 Attorney for Plaintiffs  
 26  
 27  
 28

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2  
3 **DATED:** 3/10/14



**CERTIFICATE OF SERVICE**

***Shifman v. 800 DC, LLC, Kostopoulos***

**United States District Court, Northern District of California**

**Case No. 5:13-cv-05934-EMC**

I am a citizen of the United States and employed in San Francisco, California, at the office of a member of the bar of this Court at whose direction this service was made. I am over the age of 18 and not a party to the within actions; my business address is One California Street, 18th Floor, San Francisco, California 94111.

On March 6, 2014, I served the document(s) entitled,

STIPULATION AND ORDER TO CONTINUE INITIAL CASE MANAGEMENT  
CONFERENCE

on the interested parties in this action by placing trust copies thereof enclosed in a sealed envelope(s) addressed as stated below:

**SEE ATTACHED SERVICE LIST**

☐ **(BY MAIL):** I deposited such envelope in the mail at San Francisco, California with postage fully prepaid. I am readily familiar with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be placed for collection and mailing, and deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

☐ **(VIA OVERNIGHT MAIL):** I deposit such envelope to be placed for collection and handling via UPS following our ordinary business practices. I am readily familiar with this business' practice for collecting and processing correspondence for UPS. On the same day that material is placed for collection, it is picked by UPS at San Francisco, California.

☐ **(BY ELECTRONIC MAIL):** By transmitting a true copy thereof to the electronic mail addresses as indicated below.

☒ **(BY CM/ECF SERVICE):** I caused such document(s) to be delivered electronically via CM/ECF as noted herein.

I declare under penalty of perjury under the laws of the United States that the above true and correct and was executed on March 6, 2014, at San Francisco, California.

  
Bonnie Horne

**SERVICE LIST**

***Shifman v. 800 DC, LLC, Kostopoulos***

**Case No. 5:13-cv-05934-EMC**

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Goretti Shifman, Dry Cleaning Delivery  
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